## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

LEASE AMERICA.ORG, INC.,

Plaintiff,

v.

Civil Action No.

ROWE INTERNATIONAL CORPORATION; AMI ENTERTAINMENT NETWORK, INC.; AMUSEMENT AND MUSIC OPERATORS ASSOCIATION, INC.; DOE DEFENDANTS 1-10,

Defendants.

## MOTION FOR ADMISSION OF MAXWELL M. BLECHER PRO HAC VICE

I, Eric B. Goldberg, move for attorney Maxwell M. Blecher's admission pro hac vice. As grounds for this motion, I submit the attached Declaration of Maxwell M. Blecher.

Pursuant to Local Rule 83.5.3, the undersigned counsel hereby moves for the admission pro hac vice of Maxwell M. Blecher, to represent Plaintiff Lease America.org, Inc. in the above-captioned action. Attorney Blecher is the founding partner of Blecher & Collins, P.C., 515 South Figueroa Street, Suite 1750, Los Angeles, CA 90071; telephone: (213) 622-4222; facsimile: (213) 622-1656; e-mail: mblecher@blechercollins.com.

Attorney Blecher is a member in good standing of the bar of the State of California, where he was admitted to practice in 1955. He further fulfills the credentials of an attorney seeking admission to appear in this District because he is a member in good standing and admitted to practice before the United States District Courts for the Central District of California, 1955; Northern District of California, 1963; Southern District of California, 1978;

Eastern District of California, 2006; District of Hawaii, 2004; District of Arizona, 2008; and the

United States Court of Appeals for the First Circuit, 2012; Second Circuit, 2006; Tenth Circuit,

2005; and the United States Supreme Court, 1971. Attorney Blecher was admitted pro hac vice

to this Court on January 23, 2012 in the matter of Evergreen Partnering Group, Inc. v. Pactiv

Corporation et al., Case No. 1:11-cv-10807-RGS. Attorney Blecher has not been denied

admission to this Court or disciplined by this Court or any other Court.

Attorney Blecher's certification that (1) he is a member in good standing of the

jurisdictions listed above, (2) that he has no disciplinary actions pending, nor history of

discipline and (3) that he is familiar with the Local Rules of this Court, is filed herewith, in

Affidavit form, as Exhibit A.

I will also appear as counsel of record in these proceedings.

WHEREFORE, I request that this Motion be ALLOWED and Attorney Blecher be

admitted to practice pro hac vice before this Court.

Respectfully submitted,

Lease America.org, Inc.,

By its attorneys,

/s/ Eric B. Goldberg

Eric B. Goldberg, BBO# 564398

Seegel Lipshutz & Wilchins LLP

egoldberg@slwllp.com

Wellesley Office Park

20 William Street, Suite 130

Wellesley, MA 02481

781-237-4400

Dated: January 22, 2013

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